

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,)
)
 vs.)
)
 FRANCIS KEOUGH,)
)
 Defendant.)

CRIM. NO. 04-30032-MAP

FILED
IN CLERK'S OFFICE
2005 JUN 14 A 11:46
U.S. DISTRICT COURT
DISTRICT OF MASS.

SUPPLEMENTAL JOINT MEMORANDUM PURSUANT TO LOCAL RULE 116.5(A)

The United States of America, by and through Michael J. Sullivan, United States Attorney for the District of Massachusetts, and William M. Welch II, Assistant United States Attorney, hereby files this supplemental final joint memorandum pursuant to Local Rule 116.5(A) and the Magistrate Judge's Scheduling Order.

On Monday, June 13, 2005, the Government learned for the first time that defense counsel had filed approximately six discovery motions on or about May 20, 2005. Since service had been effected through electronic filing, the Government did not receive hard copies of the discovery motions.

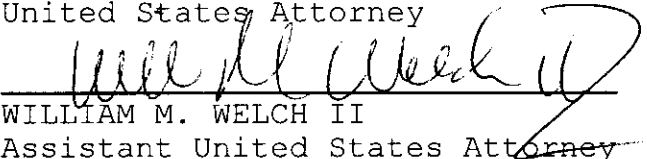
After checking with Clerk's Office, it was discovered that the wrong e-mail address for the undersigned had found its way into the docketing system for this particular case. Therefore, the Government had not received electronic notice of the filing of the discovery motions on May 20th.

Therefore, the Government intends to ask for a two week extension to respond to the discovery motions and a new date for the status conference.

Filed this 14th day of June, 2005.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney


WILLIAM M. WELCH II
Assistant United States Attorney

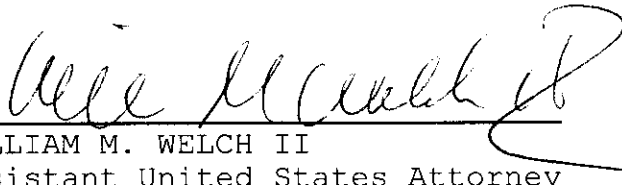
CERTIFICATE OF SERVICE

Hampden, ss.

Springfield, Massachusetts
June 14, 2005

I, William M. Welch, Assistant U.S. Attorney, do hereby
certify that I have served a copy of the foregoing by fax upon:

Jack St. Clair, Esq.
73 Chestnut Street
Springfield, MA 01103



WILLIAM M. WELCH II
Assistant United States Attorney